

DECLARATION OF K.S.

[REDACTED] pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury declares as follows:

1. My name is [REDACTED]. I am more than twenty-one years of age, competent to testify, and have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this declaration for use in this case. This declaration was executed in the state of Georgia, where I am a resident.
2. I worked as a prostitute and was a victim of sex trafficking on Fulton Industrial Boulevard in Atlanta for several years, from about 2012 through 2019. I lived at the Airway Motel located at 720 Fulton Industrial Boulevard NW, Atlanta, Georgia off and on beginning in 2012 until the motel closed.
3. The whole time I was at the Airway, the prostitution and sex trafficking at the motel was rampant and very obvious. Girls were walking around the motel picking up tricks and dates all day and night. Buyers and pimps were always on the property. Girls would often stand out in front of the motel and flag down cars and truckers wearing almost no clothes to get them to come to the Airway to buy sex. Buyers of sex were in and out of the rooms every day at all hours of the day and night.

4. There were at least 10–20 girls being sold for sex at the Airway each day on average. Most of those girls were controlled by a pimp. There were usually at least 20–30 pimps hanging around the motel, controlling those girls and selling drugs.
5. Pimps would rent multiple rooms at the Airway depending on how many girls they had working there. It was common for the pimps to have one room for the girls they were selling and another room for the pimps to also sell drugs out of. If a pimp had several girls, they would have several rooms for the girls to work out of.
6. Myself and other girls were often beaten by our pimps in the parking lot and being pulled out of our rooms. The employees at the motel saw this kind of activity frequently. Myself and other girls being sold for sex at the Airway often had bruises and cuts on our faces from these beatings that the motel employees also saw.
7. While I was at the Airway, I remember 3–4 young girls who were obviously under 18 being sold for sex at the motel.
8. Staff at the motel could easily see and hear this activity. The manager and his wife lived at the motel with their two children. Although his wife did not speak much, she was always at the window and cleaning the rooms.

9. The manager of the motel came to each door to pick up money for the next day from the girls and pimps in the rooms. The motel sold crack pipe kits in the front office for \$7.00–\$8.00. Motel guests would have to go into the office in order to purchase toilet paper, extra sheets, and towels.

10. Once I was in the office at night after there was a shooting in the motel parking lot. I saw one of the guys involved in the shooting come into the front office and pay a few hundred dollars to the man at the desk behind the window so that the motel would delete the video footage of the shooting before the police got there.

11. I have read this Declaration consisting of 11 numbered paragraphs and I declare under penalty of perjury that it is true and correct.

Executed on November 7, 2022.



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